

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

RHONDA HALL,

Plaintiff

V.

VERIZON COMMUNICATIONS, INC.,  
and VERIZON NEW ENGLAND, INC.

## Defendants

CIVIL ACTION NO. 05-30002-MAP

MARCH 29, 2005

## MOTION TO FILE LATE RESPONSE TO COMPLAINT

The Defendants, Verizon Communications, Inc. and Verizon New England, Inc., hereby move this Court for a thirty (30) day extension of time to Answer or otherwise Respond to the Complaint in the above-captioned matter. The Answer or other Response was originally due on March 28, 2005; Defendants' motion would move the due date to April 27, 2005. Defendants seek this extension to fully investigate the allegations made in the Complaint. Defendants have inquired of counsel for Plaintiff to determine whether he objects or assents to this motion, but have been unable to ascertain his position because he did not return the undersigned's phone call.

Respectfully submitted,

/s/ Stacy Smith Walsh

Stacy Smith Walsh (BBO No. 647420)

**DAY, BERRY & HOWARD, LLP**

CityPlace I, 185 Asylum Street

Hartford, CT 06103-3499

(860) 275-0100

(860) 275-0343 facsimile

sswalsh@dbh.com

**CERTIFICATE OF SERVICE**

I, Stacy Smith Walsh, hereby certify that on the 29th day of March, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to Hugh D. Heisler, Esq., of Heisler, Feldman & McCormick, P.C., 1145 Main Street, Suite 508, Springfield, MA 01103.

/s/ Stacy Smith Walsh  
Stacy Smith Walsh